

1 Jason A. Close, Esq.
2 Nevada Bar No: 13674
3 CLOSE LAW GROUP
4 2831 Saint Rose Pkwy STE 240
5 Henderson, Nevada 89052
6 Telephone: 702.983.4254
7 Facsimile: 702.924.4645
8 E-mail: jason@closelawgroup.com
9 Attorneys for Defendant

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 LAUREN DAVIS, on behalf of herself and
13 others similarly situated,

14 *Plaintiff,*

15 v.

16 BOARD SI, INC.,

17 *Defendant.*

Case No. 2:24-cv-02300-GMN-NJK

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR DEFENDANT
TO RESPOND TO PLAINTIFF'S
COMPLAINT**

(First Request)

18 Pursuant to Fed. R. Civ. P. 6(b)(1)(A), LR 7-1, LR IA 6-1, and LR IA 6-2, Plaintiff Lauren
19 Davis, on behalf of herself and others similarly situated ("Plaintiff"), and Defendant Boardsi, Inc.
20 ("Defendant"), by and through undersigned counsel, respectfully stipulate and agree and jointly
21 move the Court for an Order extending the deadline for Defendant to respond to Plaintiff's
22 Complaint (ECF No. 1, "Complaint") in this matter, to and including April 16, 2025. In support
23 thereof, Plaintiff and Defendant further state and agree as follows:

- 24 1. Plaintiff filed her Complaint in this matter on December 11, 2024.
- 25 2. Defendant executed a waiver of service of process on January 16, 2025 (ECF No.
26 13). By operation of Fed. R. Civ. P. 4(d)(3), therefore, the Defendant's response to the Complaint
27 is presently due on March 17, 2025.
- 28 3. Counsel for the parties met and conferred on March 5, 2025, via email, regarding
extending the foregoing deadline. Plaintiff agreed to grant Defendant an extension of not less than
thirty (30) days. By operation of Fed. R. Civ. P. 6(a)(1) & (5), therefore, Defendant's new deadline
to file its response to the Complaint, if approved by the Court, would be on April 16, 2025.
4. The purpose of the requested extension is to allow Defendant's counsel, who were

1 just recently retained, adequate time to fully investigate the allegations set forth in the Complaint
2 and to permit the parties to explore a possible extra-judicial resolution of their differences in this
3 matter, which may obviate the Defendant's response deadline.

4 5. This is the parties' first request for an extension of this deadline. It is not made for
5 purposes of delay and would not prejudice any party.

6 6. By this requested extension, Defendant is not waiving any objections or defenses to
7 the Complaint available under applicable law, and the parties have agreed to be bound by its terms
8 pending the Court's approval and entry of same.

9 WHEREFORE, for all of the reasons above, the parties stipulate and respectfully request
10 that the Court enter this order extending the Defendant's deadline to respond to the Complaint by
11 a period of no less than thirty (30) days, to and including April 16, 2025, along with granting all
12 other relief the Court deems just and proper.

13 Dated: March 13, 2025

Dated: March 13, 2025

14 CLOSE LAW GROUP

KIND LAW

15 By: /s/ Jason A. Close
16 Jason A. Close, Esq. (NBN: 13674)
2831 Saint Rose Pkwy STE 240
17 Henderson, Nevada 89052
Attorneys for Defendant

By: /s/ Michael Kind (w/ Permission)
Michael Kind, Esq. (NBN: 13903)
8860 South Maryland Parkway, Ste. 106
Las Vegas, Nevada 89123
Attorneys for Plaintiff

18
19 IT IS SO ORDERED:

20 
21 UNITED STATES MAGISTRATE JUDGE

DATED: March 14, 2025

22 Respectfully Submitted by:

23 CLOSE LAW GROUP

24 /s/ Jason A. Close
Jason A. Close, Esq. (NBN: 13674)
2831 Saint Rose Pkwy STE 240
25 Henderson, Nevada 89052
Attorneys for Defendant